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Attorneys for Plaintiff
PETZILLA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

PETZILLA, INC. a Delaware corporation,
d/b/a Petzila,

Plaintiff,

v.

ANSER INNOVATION LLC, a Minnesota
limited liability company,

Defendant.

Case No. 14-cv-01354 EMC

**DECLARATION OF NICOLAS GIKKAS
IN SUPPORT OF MOTION FOR LEAVE
TO FILE MOTION FOR
RECONSIDERATION OF PLAINTIFF'S
MOTION FOR EXPEDITED
DISCOVERY (Dkt. No. 17)**

Date: TBD
Time: 1:30 p.m.
Courtroom: 5, 17th Floor
Judge: Hon. Edward M. Chen

1 I, Nicolas Gikkas, declare as follows:

2 1. I am lead attorney and counsel of record for plaintiff Petzilla, Inc. ("Petzila") in the
3 above-captioned matter. I make this declaration on personal knowledge and if called as a witness
4 could and would testify competently thereto.

5 2. Attached hereto as Exhibit A is a true and correct copy of Plaintiff's First Set of
6 Request for Production of Documents to Defendant Anser Innovation LLC [Nos. 1-20], served on
7 June 6, 2014.

8 3. Attached hereto as Exhibit B is a true and correct copy of Plaintiff's Notice of
9 Deposition of Lisa M. Lavin, served on June 17, 2014.

10 4. On or about June 24, 2014, Anser produced, via emailed hyperlink, approximately
11 292 pages for Anser's first response to Petzila's document request.

12 5. Attached hereto as Exhibit C is a true and correct copy of a letter dated July 1,
13 2014, from Nicolas Gikkas to Grant Fairbairn.

14 6. On or about July 8, 2014, Anser produced, via emailed hyperlink, approximately
15 153 pages for Anser's second response to Petzila's document request.

16 7. Attached hereto as Exhibit D is a true and correct copy of a letter dated July 8,
17 2014, from Nicolas Gikkas to Grant Fairbairn.

18 8. On or about July 11, 2014, Anser produced, via emailed hyperlink, approximately
19 25 pages for Anser's third response to Petzila's document request.

20 9. Attached hereto as Exhibit E is a true and correct copy of a document produced by
21 Anser with bates number AIL000258.

22 10. Attached hereto as Exhibit F is a true and correct copy of a document produced by
23 Anser with bates number AIL000032.

24 11. Attached hereto as Exhibit G is a true and correct copy of a document produced by
25 Anser with bates number AIL000462.

26 12. Attached hereto as Exhibit H is a true and correct copy of certain pages from
27 documents produced by Anser with bates numbers AIL000457-458 (email) and AIL000443 (list).
28

1 13. Attached hereto as Exhibit I is a true and correct copy of a document produced by
2 Anser with bates numbers AIL000284-286.

3 14. Attached hereto as Exhibit J is a true and correct copy of a document produced by
4 Anser with bates number AIL000260.

5 15. Attached hereto as Exhibit K is a true and correct copy of a document produced by
6 Anser with bates numbers AIL000469-470.

7 16. Attached hereto as Exhibit L is a true and correct copy of a document produced by
8 Anser with bates numbers AIL000444.

9 17. Attached hereto as Exhibit M is a true and correct copy of certain pages from
10 Anser's website, www.petchatz.com/store/retailers/account, retrieved on July 11, 2014. These
11 web pages were also previously retrieved on May 13, 2014, as part of Petzila's Reply to
12 Opposition to Motion for Expedited Discovery and Enlarging Time for Defendant's Motion to
13 Dismiss at page 6. (Dkt. No. 27).

14 18. Attached hereto as Exhibit N is a true and correct copy of a letter dated July 8,
15 2014, from Grant Fairbairn to Nicolas Gikkas.

16 19. Attached hereto as Exhibit O is a true and correct copy of a letter dated July 11,
17 2014, from Grant Fairbairn to Nicolas Gikkas.

18 20. Attached hereto as Exhibit P is a true and correct copy of a document produced by
19 Anser with bates numbers AIL000265-83.

20 21. Attached hereto as Exhibit Q is a true and correct copy of U.S. Pat. No. 8,201,522
21 and related USPTO Patent Assignment Abstract of Title evidencing transfer to Anser Innovation
22 LLC (the latter retrieved on July 18, 2014 from <http://assignments.uspto.gov/assignments/>).

23 22. Attached hereto as Exhibit R is a true and correct copy of a document produced by
24 Anser with bates number AIL000257.

25 23. Attached hereto as Exhibit S is a true and correct copy of a document produced by
26 Anser with bates number AIL000264.

27 24. Attached hereto as Exhibit T is a true and correct copy of an email dated July 15,
28 2014, from Nicolas Gikkas to Grant Fairbairn.

1 I declare under penalty of perjury under the law of the United States of America that the
2 foregoing is true and correct. Executed on this 22nd day of July 2014.

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4 By: /s/ Nicolas S. Gikkas
5 NICOLAS S. GIKKAS
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